

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

<p>Preston Byron Knapp and Michelle Nichole Knapp,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>Compass Minnesota, LLC and Daniel Phillip Hollerman.</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 0:24-cv-00100-SRN-DTS</p> <p style="text-align: center;">DECLARATION OF CARL E. CHRISTENSEN REGARDING ATTORNEY FEES</p>
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STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

I, Carl E. Christensen, hereby declare under penalty of perjury that the following is true and correct:

1. I am an attorney duly licensed to practice law in the State of Minnesota and before the United States District Court for the District of Minnesota. I am one of the attorneys representing Defendant Daniel Phillip Hollerman (“Hollerman”) in the above-captioned matter.

2. I submit this declaration on my personal knowledge and in accordance with the Court’s Order from oral argument on May 29, 2024, and the associated text only minute entry from May 29, 2024 [ECF No. 56], granting Defendants’ Joint Motion for Sanctions [ECF No. 44], as well as the Court’s June 4, 2024 Order granting Defendants’ joint Motion to Dismiss [ECF No. 10], denying

Plaintiffs' Motions for Default Judgment as to both Defendants [ECF Nos. 27, 30], and denying Plaintiffs' Motion to Compel Communication [ECF No. 22].

3. During the hearing on May 29, 2024, the Court made mention of a case in which Preston Byron Knapp sued Wings Financial Credit Union. I believe I mistakenly stated that federal suit was dismissed.

4. On or about October 18, 2023, Preston Byron Knapp initiated a lawsuit against Wings Financial Credit Union, case number 23-CV-03219. That case was assigned to Your Honor.

5. On or about February 7, 2024, Mr. Knapp filed a motion to dismiss in that case. On February 9, 2024, the Court granted that motion and dismissed that case without prejudice.

6. Shortly after that, on February 12, 2024, Mr. Knapp filed another lawsuit, this time against Wings Credit Union, a/k/a Wings Financial Credit Union, case number 24-CV-00434. This case was assigned to Judge Donovan Frank.

7. That second case in front of Judge Frank is still ongoing, with various motions pending.

8. I submit the above paragraphs to correct my misstatement while on the record.

9. I submit the following information regarding attorney fees.

10. I graduated from William Mitchell College of Law of Law in May 2005.

11. I have been an attorney since October of 2005.

12. I have owned Christensen Sampsel PLLC (formerly Christensen Law Office PLLC) since February of 2008.

13. I am litigator and member of Christensen Sampsel PLLC, formerly known as Christensen Law Office PLLC in Minneapolis. I focus the majority of my practice on real estate, consumer, contract, and intellectual property law. This includes litigation and trial work related to matters involving, among other things, real estate disputes, mortgage foreclosure defense, contract disputes, and consumer law work under federal laws such as the Fair Debt Collection Practices Act, the Truth-in-Lending Act, Fair Credit Reporting Act, and the Credit Repair Organizations Act. I lead the firm's consumer law, business litigation, real estate litigation, trademark litigation, and appellate practice groups.

14. I have been involved in hundreds of contract and real estate cases in various state court and federal court. I have represented clients at all stages of litigation, including through trial and appeal.

15. Since 2010, I have given 22 Continuing Legal Education seminars on debtors' remedies, real estate, and consumer law. Recent examples include the following:

- a. "Making Mediation Meaningful: Best Practices in Consumer Law Cases" (MSBA February 13, 2024):
- b. "Developments in RESPA: The Impossible Error" (MSBA December 1, 2023);
- c. "How to Defend Against Foreclosure – New Issues and New Defenses"

(Minn. CLE September 19, 2023);

- d. "The Complete Lawyer: Consumer Law," (Minn. CLE June 2, 2022).
- e. "Mortgage Foreclosures A to Z: Defenses to Foreclosure," (Minn. CLE Feb. 3, 2021).
- f. "Real Estate Issues Facing the Elderly: From Nest Egg to Nefarious Interloper," 2019 Elder Law Institute (Minn. CLE Oct. 11, 2019).
- g. "Strategies for Dealing with Foreclosures in Probate," Probate & Trust Law Conference 2019 (Minn. CLE June 10, 2019).
- h. "Attorney Liens in Minnesota: The Newly Inferior Interest," (Henn. Co. Bar. Assoc. Real Property Jan. 24, 2019).

16. I have spoken on debtors' remedies at the 2011 Debtor and Creditor Conference, the 2011 Real Estate Institute, the 2019 Probate & Trust Law Conference, and the 2019 Elder Law Institute.

17. I am the former co-chair of the Debtor/Creditor Remedies Section of the Hennepin County Bar Association, a member of the National Association of Consumer Advocates, and Christensen Law Office has been a member of the Better Business Bureau since 2008.

18. I am currently an at large Counsel Member of the Minnesota Bar Association Consumer Litigation Section, which I have been since 2016.

19. I also participate regularly in the United States District Court, District of Minnesota's *Pro Se* Project.

20. I am admitted to practice law in the states of Minnesota and New York.

21. I am also admitted to appear before the United States District Courts, Districts of Minnesota, Colorado, and the Southern District of New York.
22. I am also admitted to appear before United States Circuit Court of Appeals in the Eighth and Tenth Circuits.
23. I have appeared Pro Hac Vice in the United States District Courts, Eastern District of California, District of Utah, Northern District of New York, and Eastern District of Pennsylvania.
24. I am the author of Legal Quicksheet, “Defenses to Foreclosure Actions,” (Minn. CLE 2011).
25. I am quoted in the following news articles:
 - a. “Grave Errors and Undead Rework Loans,” Wall Street Journal (July 23, 2010).
 - b. “Mortgage Help Can Turn into Disaster,” StarTribune (Jan. 26, 2011).
 - c. “Minnesota Howowner in Limbo After Bank Error,” StarTribune (Oct. 12, 2013).
26. I was a contributing author to Magnuson, Roger and Richard Saliterman, *Advising Minnesota Corporations and Other Business Organizations*, (Juris 2011).
27. Two years after graduating from William Mitchell College of Law in 2005, the College hired me as an adjunct professor to teach the Intellectual Property Foundations class, which I did for four consecutive years.

28. I supervise all attorneys that work for Christensen Sampsel PLLC. I also supervise all of the accounting for client accounts, and I have personal knowledge of the facts of this case.

29. As the supervisor of client accounts and billing, I have firsthand knowledge that attorneys and staff at Christensen Sampsel PLLC performed various work for Hollerman related to Christensen Sampsel PLLC's representation of him in this case. This work included legal research, legal drafting, correspondence, oral argument, and client counseling, among other things.

30. My current hourly rate is \$500. Prior to January 2024, my hourly rate was \$450. I am familiar with the customary billing rates in the Twin Cities for real estate and litigation attorneys. My current billing rate is reasonable and consistent with the market rate for services provided by attorneys with similar backgrounds and experience.

31. As set forth below, the amount of time that I spent on this matter is 23.30 billable hours, for a total of \$10,135.00. I was assisted in this matter by the following members of our staff:

- a. Attorney Aaron Sampsel – Mr. Sampsel is a 2016 Mitchell Hamline School of Law graduate and trial attorney. He is also a partner at Christensen Sampsel, PLLC. He focuses his practice on ethics defense, business litigation, real estate litigation, and contract litigation. Mr. Sampsel has represented clients in all stages of litigation, from trial to appeal. Mr. Sampsel's hourly rate is \$400.00. Mr. Sampsel's work

related to this matter amounted to 2.40 billable hours for a total of \$840.00.

- b. Associate Attorney Christopher Wilcox – Mr. Wilcox is a 2011 University of Minnesota Law School graduate and trial attorney. He focuses his practice on real estate litigation, contract litigation, and consumer litigation. Mr. Wilcox has represented clients in all stages of litigation, from trial to appeal. Mr. Wilcox's hourly rate is \$375.00. Mr. Wilcox's work related to this matter amounted to 1.30 billable hours for a total of \$487.50.
- c. Associate Attorney Robert Kouba – Mr. Kouba is a 2016 Mitchell Hamline School of Law graduate and trial attorney. He focuses his practice on business litigation, real estate litigation, contract litigation, and consumer litigation. Mr. Kouba has represented clients in all stages of litigation, from trial to appeal. Mr. Kouba's hourly rate is \$300.00. Mr. Kouba's work related to this matter amounted to 49.30 billable hours for a total of \$14,790.00.
- d. Law Clerk Tobi Ladipo – Ms. Ladipo is a former law clerk of the firm and a May 2024 graduate of St. Thomas School of Law. Ms. Ladipo provided assistance with legal research and writing under my supervision. Ms. Ladipo's hourly law clerk rate was \$95 and her work related to this matter amounted to 7.8 billable hours, for a total of \$741.00.

- e. Law Clerk Sydney Maglio – Ms. Maglio is a former law clerk of the firm and a May 2024 graduate of Mitchell Hamline School of Law. Ms. Maglio provided assistance with legal writing under my supervision. Ms. Maglio’s hourly law clerk rate prior to January 1, 2024 was \$85. Ms. Maglio’s work related to this matter amounted to 0.10 billable hours, for a total of \$8.50.
- f. Law Clerk Toni Hoffer – Ms. Hoffer is a former law clerk of the firm and a May 2024 graduate of St. Thomas School of Law. Ms. Hoffer provided assistance with legal writing under my supervision. Ms. Hoffer’s hourly law clerk rate was \$95. Ms. Hoffer’s work related to this matter amounted to 0.90 billable hours, for a total of \$85.50.
- g. Paralegal Lisa Robertson – Ms. Robertson provides paralegal support on our litigation matters and has worked in that capacity with the firm since May 2014. Ms. Robertson’s hourly paralegal rate is \$140. Prior to January 1, 2024, Ms. Robertson’s hourly paralegal rate was \$125.00. Ms. Robertsons work related to this matter amounted to 4.50 billable hours, for a total of \$627.00.

32. The time reflected in my firm’s billing records was reasonable and necessary to address and defend the frivolous nature of Plaintiffs’ Complaint and motion practice. In particular, the issues that Plaintiffs raised in their Complaint and Motion to Compel Communication, and those that they raised in response to Defendants’ Rule 11 Safe Harbor Notice, required significant effort to effectively

address, refute, and properly dispose of through motion practice. This is reflected in the significant amount of time spent performing legal research and briefing Defendants' joint motions to dismiss and for sanctions, as well as defending Plaintiffs' motion to compel communication, and are reasonable in light of Plaintiffs' claims and assertions.

33. Moreover, and as a courtesy to the Hollerman, there are a number of billable entries that we did not charge for and, instead, passed through at a \$0.00 rate in an effort to preserve some of the costs associated with defending Plaintiffs' frivolous claims and motions.

34. The total fees, costs, and expenses incurred by Hollerman to defend this matter amount to \$27,816.83. This amount is broken down as follows:

- a. The attorney fees and time spent by myself related to defending this matter amount to a total of \$10,135.00. That time is detailed as follows:

Date	Description	Hours	Rate	Amount
11/28/23	Discuss matter with client, including mapping out next steps and discussing strategy with Atty Peper and buyers. Discuss matter with Atty Peper and obtain documents from him.	1.10	450.00	495.00
11/30/23	Draft complaint, adding sections on introduction, parties, jurisdiction, and framed out claims.	2.70	450.00	1215.00
12/7/23	Continue drafting complaint; organizing client files; examine client agency	0.70	450.00	315.00

	and purchase agreements.			
12/11/23	Receive message from client seeking status update.	0.10	0.00	0.00
	Researching Chapter 181 MN Statutes; drafting Compass Complaint; managing case files;			
12/12/23	calculating figures; reviewing contracts; searching emails; and analyzing case law for commission disputes.	1.40	450.00	630.00
	Review questions related to arbitration and unpaid commissions statute.			
12/13/23	Discuss appearance of Art Boylan with statutory cancellation. Also discuss next steps with client.	0.30	450.00	135.00
	Draft commissions demand. Call attorney Boylan to discuss representation. Also			
12/13/23	contact Atty Eaton to confirm representation. Finalize demand draft. Send to client for approval.	1.30	450.00	585.00
	Receive response from client			
12/14/23	to draft commissions demand.	0.10	0.00	0.00
	Revise demand for commissions with client input. Collect and compile exhibits. Prepare for execution and sending.			
12/15/23	Email to counsel.	0.70	450.00	315.00
	Various times: emails from Brandon Joe Williams.			
12/16/23	Respond and inquire into attorney status.	0.10	450.00	45.00
	Searching for attorney credentials on the State Bar of California; reviewing Williams and Williams Law			
12/18/23		0.70	450.00	315.00

	Firm's about page; review Williams petition to change name for identity and attorney information; examining Brandon Joe Williams' LinkedIn profile; responding to Williams regarding the fact that he is not an attorney. Send email to Preston and Michelle Knapp that			
12/18/23	Brandon Joe Williams is not an attorney and will not be discussing this matter with him.	0.10	450.00	45.00
12/20/23	Follow up with Preston Knapp regarding using sovereign citizen defenses and accruing damages	0.20	450.00	90.00
1/16/24	Various times: follow up with client related to next steps in litigation and lawsuit brought by Knapps in federal court.	0.30	0.00	0.00
1/17/24	Follow up with Paralegal Robertson regarding notice of appearance.	0.10	0.00	0.00
1/18/24	Meet with Client to discuss federal lawsuit and next steps. Assign response in Federal suit to Atty Kouba.	0.30	500.00	150.00
1/19/24	Follow up with Knapps about sending privileged information and deletion of their emails.	0.10	0.00	0.00
1/19/24	Save all communications to file. Follow up with Knapps regarding deletion of emails.	0.50	500.00	250.00
1/22/24	Finalize complaint, adding language related to unpaid commissions damages. Implement clerk revisions. Send to client for review.	1.30	500.00	650.00

1/23/24	Finalize complaint. Follow up with client related to COMPASS participation in state matter.	0.30	500.00	150.00
1/23/24	Review Rule 11 letter to Knapps. Revise to make more direct and simplify. Receive phone message from COMPASS' counsel.	0.20	500.00	100.00
1/24/24	Return phone call and discuss next steps in federal case. Also discuss authority for Hollerman to proceed in pursuing his commissions.	0.40	500.00	200.00
1/24/24	Edit Rule 11 letter with Atty Kouba.	0.30	0.00	0.00
1/25/24	Revise Knapp Rule 11 document; send edits to Atty Kouba.	0.30	500.00	150.00
1/30/24	Researching case law and statutes relevant to real estate commissions; follow up with Atty Mansfield Hirte related to Compass interposing a commissions demand. Follow up with client related to Compass' preference to deal with federal lawsuit first.	1.20	500.00	600.00
1/30/24	Revise Rule 11 demand to Knapps. Send to Atty Mansfield Hirte for review and approval.	0.40	500.00	200.00
1/31/24	Reviewing email correspondence related to Compass v. Knapp; managing and organizing inbox across all accounts.	0.10	0.00	0.00
1/31/24	Reviewing an article on Minn. Stat § 181.145; contact author, Atty Tom Olson, regarding any further developments.	0.10	0.00	0.00

2/8/24	Review and revise memorandum of law in support of motion to dismiss.	0.50	500.00	250.00
2/12/24	Finalize motion to dismiss. Send to counsel for review.	0.20	500.00	100.00
2/14/24	Receive email related to engaging in joint motion to dismiss with Compass. Follow up with counsel on logistics.	0.20	500.00	100.00
3/5/24	Editing defense memorandum in opposition and memo supporting motion for sanctions; discuss edits and strategy with Robert Kouba.	0.20	500.00	100.00
3/8/24	Review responsive memo opposing motion for default; approve finalization of draft.	0.70	500.00	350.00
3/12/24	Review and revise opposition memorandum for default.	0.40	500.00	200.00
3/18/24	Review and revise memorandum in support of motion for sanctions, incorporating feedback from Clerk Hoffer and Atty Kouba.	0.10	500.00	50.00
3/22/24	Edit and revise memorandum of law in support of motion to dismiss; share edits with Atty Kouba.	0.10	500.00	50.00
3/26/24	Review final draft of reply memo in support of motion to dismiss. Send approval to Atty Kouba.	0.10	500.00	50.00
5/24/24	Discussion with Compass Atty Michael Kernstock about upcoming hearing.	0.30	500.00	150.00
5/24/24	Inform client of meeting with Atty Michael Kernstock	0.10	500.00	50.00

	and meeting before hearing. Discuss pending motion for sanctions with client. Discuss next steps in case of winning or losing. Task paralegal with organizing motion filings; prepare for argument—develop outline.	0.70	500.00	350.00
5/28/24	Review all motion materials.			
5/29/24	Prepare oral argument outline.	0.90	500.00	450.00
5/29/24	Print and review memo in opposition to motion to compel for facts related to Branden Joe Williams.	0.20	500.00	100.00
5/29/24	Finalize preparation for hearing. Attend hearing and undertaking associated travel.	2.30	500.00	1150.00
6/6/24	Respond to Katie Hollerman's regarding Brandon Williams' Facebook and Insta posts regarding the case and his being in control of the next steps.	0.10	0.00	0.00
6/12/24	Revise declaration in support of attorney fees. Follow up with Atty Kouba regarding accounting of fees.	0.30	0.00	0.00
6/13/24	Reviewing declaration for Hollerman supporting claim for fees. Undertake revisions.	0.10	0.00	0.00
6/13/24	Review final draft from Atty Kouba of memo in support of fees. Follow up related to capturing all billing and recalculating amounts in declarations.	0.10	0.00	0.00
	Subtotal	23.30	--	\$10,135.00

- b. The attorney fees and time spent by attorney Aaron Sampsel related to defending this matter amount to a total of \$840.00. That time is detailed as follows:

Date	Description	Hours	Rate	Amount
1/18/24	Discuss with Atty Kouba federal procedure for motion to dismiss and assessment of related state law claims.	0.20	400.00	80.00
1/19/24	Review complaint; discuss Rule 11 safe harbor letter and basis for pushing back on claims in safe harbor letter with Atty Kouba, including court's lack of 1332 and 1331 jurisdiction, and apparent criminal statutes presented as claims in a civil action.	0.50	400.00	200.00
1/23/24	Revise Rule 11 safe harbor letter.	0.70	400.00	280.00
1/30/24	Discuss Rule 11 motion, safe harbor process with Atty Kouba.	0.20	400.00	80.00
2/8/24	Discuss with Atty Kouba authority regarding private right of action under Title 12.	0.20	400.00	80.00
2/21/24	Discuss with Atty Kouba process and local rules related to briefing timing in light of Plaintiffs' motions; receipt and review of court's text-only order striking the hearing on our motion to dismiss and establishing briefing schedule for motions in light of Plaintiffs' pro se status.	0.20	400.00	80.00
3/11/24	Discuss with Atty Kouba status of default motion response and issues with service.	0.10	400.00	40.00
6/12/24	Discuss with Atty Kouba revisions to declarations in support of fee petition and elements required to satisfy reasonableness standard.	0.30	0.00	0.00
	Subtotal	2.40	--	\$840.00

- c. The attorney fees and time spent by attorney Christopher Willcox related to defending this matter amount to a total of \$487.50. That time is detailed as follows:

Date	Description	Hours	Rate	Amount
2/16/24	Discuss Local Rule 7.1 requirements with Atty Kouba.	0.20	375.00	75.00
2/16/24	Discuss Minn. Stat. § 523 Discuss proposed email response to Plaintiff and purported "common law" counsel.	0.10	375.00	37.50
2/20/24	Discuss potential waiver of insufficiency of service of process defense and need to include in motion. Review Attorney Kouba edits to motion. Serve as witness for meet and confer on all motions.	1.00	375.00	375.00
	Subtotal	1.30	--	\$487.50

- d. The attorney fees and time spent by attorney Robert Kouba related to defending this matter amount to a total of \$13,290.00. That time is detailed as follows:

Date	Description	Hours	Rate	Amount
1/18/24	Review Hollerman complaint and applicable local rules in preparation for motion to dismiss.	0.60	300.00	180.00
1/19/24	Various times: review email exchanges with Atty Christensen and pro se Plaintiff.	0.10	300.00	30.00
1/19/24	Review communications and documents from Knapp and Williams in preparation for Rule 11.	0.50	300.00	150.00
1/19/24	Confer with Atty Sampsel	0.50	300.00	150.00

	regarding Rule 11, lack of jurisdiction, and apparent use of criminal statutes in civil suit.			
1/22/24	Email client regarding Mansfield Tanick representation of Compass and update on process.	0.10	300.00	30.00
1/22/24	Call with client regarding communications with Compass counsel and our response to federal complaint.	0.30	300.00	90.00
1/22/24	Review federal statutes cited by Plaintiff in their complaint for Rule 11 letter to push frivolousness; begin draft Rule 11 letter.	1.60	300.00	480.00
1/23/24	Review and revise Rule 11 letter, specifically addressing each count and why it is frivolous; send to Atty Christensen for review.	1.70	300.00	510.00
1/23/24	Draft notice of motion and motion for Rule 11.	0.40	300.00	120.00
1/24/24	Review email from client regarding Compass status for federal lawsuit and review of state complaint.	0.10	300.00	30.00
1/24/24	Review ECF filing by Knapps regarding acceptance of electronic filing.	0.10	300.00	30.00
1/24/24	Confer with Atty Christensen regarding Rule 11 letter, and strategy to simply background facts and bring out more facts related to Brandon Williams pushing the case.	0.30	300.00	90.00
1/25/24	Review and revise Rule 11 letter based on conversations with Atty Christensen.	1.10	300.00	330.00
1/30/24	Confer with Atty Christensen regarding motion for sanctions to accompany Rule 11; revise the same.	0.10	300.00	30.00
1/31/24	Various times: review email	0.10	300.00	30.00

	exchanges with Compass.			
	Review filings by Knapps asserting proper service of Defendants by Certified mail; review federal rule 4 and local rule regarding service.	0.10	300.00	30.00
2/2/24	Confer with Atty Christensen regarding arguments in motion to amend, specifically to focus on their arguments being grounded in federal law that is nonsensical and wrong on the law.	0.20	300.00	60.00
2/2/24	Review relevant authority regarding motion to dismiss in preparation of drafting memo in support of motion to dismiss.	0.10	300.00	30.00
2/5/24	Continue draft motion to dismiss, specifically fact section.	0.50	300.00	150.00
2/5/24	Begin review of relevant authority regarding use of documents embraced by Complaint.	0.20	300.00	60.00
2/6/24	Review relevant authority regarding private rights of action under Title 12 and Title 18; review relevant authority addressing "sovereign citizen" arguments regarding securities.	1.60	300.00	480.00
2/6/24	Continue drafting motion to dismiss, specifically section regarding 12 U.S.C. 504 claim, and assertions in complaint that contracts are securities.	1.10	300.00	330.00
2/7/24	Continue draft motion to dismiss, specifically addressing their claims under Title 18, and claims that 12 USC 412 applies.	2.50	300.00	750.00
2/8/24	Finalize memo in support of motion to dismiss (1.0); confer with Atty Christensen regarding edits to the same (0.2); finalize memo based on conversation with Atty Christensen and	1.60	300.00	480.00

	prepare the same to send to Compass (0.4)			
2/9/24	Review Knapp federal complaint against Wings Financial involving the same property; add fact citation regarding the same to memo.	0.50	300.00	150.00
2/15/24	Review local rules and Judge Nelson's practice pointers regarding motions to dismiss and policies and procedures related to the same.	0.30	300.00	90.00
2/15/24	Email with counsel for Compass regarding meet and confer requirement and local rules and Judge Nelson's practice pointers.	0.10	300.00	30.00
2/15/24	Email Knapps regarding meet and confer.	0.10	300.00	30.00
2/16/24	Review email from the Knapps regarding meet and confer; respond to the same.	0.10	300.00	30.00
2/16/24	Various times: Call with Court regarding date for motion to dismiss (0.1); confer with Atty Christensen regarding the same (0.1); call with client regarding the same (0.2); email counsel for Compass regarding the same (0.1)	0.40	300.00	120.00
2/16/24	Review email from Knapp regarding meet and confer; confer with Atty Wilcox regarding the same; respond to the same.	0.50	300.00	150.00
2/16/24	Draft 7.1a certification, 7.1f certification, proposed order, motion, and notice of hearing for motion to dismiss; send the same to counsel for Compass (0.8); call with counsel for Compass regarding the same (0.2).	1.00	300.00	300.00
2/19/24	Call with counsel for Compass regarding motion to dismiss,	0.30	300.00	90.00

	meet and confer, and motion for sanctions.			
2/19/24	Email pro se Plaintiff Preston Knapp confirming meet and confer proposed date and time.	0.10	300.00	30.00
2/19/24	Review Compass redline edits to memorandum of law; make minor redline edits to the same; send to Compass for review.	1.00	300.00	300.00
2/20/24	Various times: Review email exchanges with the Knapps and counsel for Compass regarding Knapps' proclaimed motion to compel and motion for default.	0.20	300.00	60.00
2/20/24	Review email exchanges between Compass, Atty Christensen, and Preston Knapp regarding Knapps' argument on default.	0.20	300.00	60.00
2/20/24	Attend meet and confer phone call with Knapp and counsel for Compass (0.3); call with Compass regarding the same.	0.40	300.00	120.00
2/20/24	Various times: review relevant authority regarding service of process issues (0.3); review and revises edits from Compass on motion to dismiss documents and include argument section related to service of process issue (1.0); email exchanges with counsel for Compass regarding the same (0.2); confer with counsel for Compass on motion to dismiss documentation (0.4).	1.60	300.00	480.00
2/21/24	Call with client discussing Knapps' motions, our motion, and next steps.	0.60	300.00	180.00
2/22/24	Review email from counsel for Compass regarding inquiries on Rule 11 memo and briefing Plaintiffs' motions; email to chambers and parties regarding clarification on motion to compel	0.20	300.00	60.00

	briefing.			
2/22/24	Call with counsel for Compass on motion to compel.	0.20	300.00	60.00
2/22/24	Review additional filings by the Knapps; compare subsequent motion filings with original motion filings for any differences.	0.30	300.00	90.00
2/23/24	Various times: review and finalize joint motion for sanctions; review and finalize Rule 11 letter to Knapps; prepare the same for mailing and email; email the same.	0.40	300.00	120.00
2/26/24	Review email from client with pictures of posts from Brandon Williams regarding our lawsuit.	0.20	300.00	60.00
2/26/24	Review new text order from court regarding briefing for motions; calendar the same.	0.30	300.00	90.00
2/26/24	Review Knapps' response to Rule 11 letters.	0.20	300.00	60.00
2/28/24	Confer with Clerk Ladipo regarding response to motion for default judgment and memo in support of Rule 11 sanctions.	0.20	300.00	60.00
2/28/24	Begin review and revision of memo in opposition to motion to compel.	0.40	300.00	120.00
3/4/24	Begin review and revision of joint MOL opposing motion to compel and joint MOL supporting sanctions.	0.70	300.00	210.00
3/5/24	Review and revise Rule 11 memo and memo in opposition to motion to compel based on edits from Atty Christensen.	0.20	300.00	60.00
3/5/24	Call with counsel for Compass on joint memo opposing motion to compel and Rule 11 memo.	0.30	300.00	90.00
3/5/24	Review filing by Knapps and review of cited legal authority.	0.40	300.00	120.00
3/6/24	Finalize revisions to joint memos	1.50	300.00	450.00

3/7/24	opposing motion to compel and supporting motion for sanctions; draft declaration of Atty Kouba regarding the same; gather and prepare exhibits for the same. Revise draft memo in opposition to motion for default, specifically drafting fact section and arguments related to Rule 4 service.	1.20	300.00	360.00
3/8/24	Confer with Atty Wilcox regarding Rule 11 timeframe for filing of motion, and possible argument inclusion in memo regarding Brandon Joe Williams controlling litigation strategy.	0.20	300.00	60.00
3/8/24	Call with counsel for Compass discussing joint motion to compel and Rule 11 memo.	0.30	300.00	90.00
3/8/24	Finalize revision of memo in opposition of motion for default. Finalize edits to RJK declaration in opposition and memo in	0.70	300.00	210.00
3/8/24	opposition of motion to compel; send the same to counsel for Compass.	0.30	300.00	90.00
3/11/24	Various times: email exchanges counsel for Compass regarding certificate of compliance for response memo to motion to compel and Knapps response to our motion to dismiss.	0.30	300.00	90.00
3/12/24	Review and revise memo in opposition to default, specifically to add section regarding their failure to state a claim and the fact Plaintiffs did not substantiate any damages; prepare and finalize certificate and proposed order for filing; review Judge Nelsons' practice pointers regarding motion filings and courtesy copies.	1.80	300.00	540.00

3/12/24	Review Knapps response memo in opposition to Motion to Dismiss.	0.50	300.00	150.00
3/12/24	Call with counsel for Compass to discuss joint reply in support of Motion to Dismiss.	0.50	300.00	150.00
3/15/24	Revise Rule 11 memo, specifically add sections referencing Knapps response in which they admit some of their claims are frivolous.	0.50	300.00	150.00
3/18/24	Review email from Compass regarding additional argument in support of sanctions that Plaintiffs have conducted their own research and chosen to ignore case law; therefore sanctions are appropriate; call with counsel for Compass regarding the same.	0.20	300.00	60.00
3/18/24	Revise Rule 11 memo, finalizing argument related to the Knapps acknowledgments in their response, and add small argument related to the fact that pro se litigants that have shown they researched their claims have been sanctioned by the Court in other cases; draft supplemental motion documents for motion for sanctions; send the same to counsel for Compass for review.	1.40	300.00	420.00
3/18/24	Call with chambers regarding need for notice of motion for sanctions; email to chambers regarding the same.	0.20	300.00	60.00
3/19/24	Draft argument related to federal claims for reply in support of motion to dismiss.	1.00	300.00	300.00
3/19/24	Various times: review email exchanges with client regarding exclusion list.	0.10	300.00	30.00
3/19/24	Various times: review email	0.20	300.00	60.00

	exchanges from Court and counsel for Compass regarding Rule 11 hearing in person; respond to the same; call with client discussing the same. Review Compass edits and			
3/19/24	changes to Rule 11 memorandum.	0.30	300.00	90.00
3/20/24	Finalize edits to Rule 11 memo; send to Compass for filing.	0.10	300.00	30.00
3/20/24	Finalize Defendants' reply section related to federal claims; send the same to counsel for Compass.	0.20	300.00	60.00
3/21/24	Review Plaintiffs' reply memo in support of their motion to compel.	0.20	300.00	60.00
3/22/24	Review and revise reply memo in support of MTD; send the same to counsel for Compass for finalization and filing.	0.20	300.00	60.00
3/25/24	Review emails from Preston Knapp regarding filed documents (Reply to Default Mtns and Response to Mtn for Sanctions).	0.10	300.00	30.00
3/25/24	Review memo filings by the Knapps' supporting default and opposing sanctions.	0.40	300.00	120.00
3/25/24	Review final version of reply memo from Compass; respond to counsel regarding the same.	0.20	300.00	60.00
3/26/24	Email counsel for Compass approval of the draft reply memo.	0.10	300.00	30.00
4/15/24	Call with client discussing Bell v. Knapp state court case, federal court filings, and Knapp v Wings federal case.	0.40	300.00	120.00
4/17/24	Call with client regarding Knapps' argument on service.	0.20	300.00	60.00
5/14/24	Email from chambers regarding time change for hearing; call	0.10	300.00	30.00

	with client regarding the same; email to client confirming the same.			
5/29/24	Travel to and from St. Paul federal courthouse for hearing on Rule 11 motion for sanctions.	1.00	300.00	300.00
5/29/24	Attend Rule 11 motion for sanctions oral argument.	0.50	300.00	150.00
5/29/24	Debrief with client and counsel for Compass regarding Rule 11 motion for sanctions argument, import of order from the bench, and timeline for affidavit of costs.	0.50	300.00	150.00
5/31/24	Confer with Atty Christensen regarding affidavit of attorney fees and costs; email to counsel for Compass regarding the same.	0.20	300.00	60.00
6/3/24	Emails with client regarding Knapps' ordering transcript, updates on Brandon Williams social media posting about case, and discussions regarding Knapps' possible appeal.	0.10	300.00	30.00
6/3/24	Email from counsel for Compass regarding affidavit of attorney fees and costs and commissions.	0.10	300.00	30.00
6/4/24	Review court order granting motion to dismiss and denying Plaintiffs' motions.	0.30	300.00	90.00
6/5/24	Email with counsel for Compass regarding affidavit of attorney fees and costs.	0.10	300.00	30.00
6/11/24	Draft affidavit in support of fees. Call with counsel for Compass regarding affidavit of fees and costs, and updated posts by Brandon Joe Williams regarding our case.	0.90	300.00	270.00
6/11/24	Email with counsel for Compass regarding draft declaration in support of fees.	0.20	300.00	60.00
6/12/24	Review ECF filing to confirm	0.10	300.00	30.00

6/12/24	second Wings Financial case filed by Knapp is still active. Begin draft affidavit of client regarding reasonableness of attorney fees.	1.00	300.00	300.00
6/12/24	Confer with Atty Sampsel regarding compilation and calculation of attorney fees and costs for submittal with affidavit.	0.30	300.00	90.00
6/13/24	Draft memo in support of attorney fees.	1.30	300.00	390.00
6/13/24	Emails with client regarding affidavit.	0.20	300.00	60.00
6/13/24	Finalize client affidavit in support of fees; send that and Atty Christensen affidavit to client for review.	0.50	300.00	150.00
6/13/24	Finalize Atty Christensen affidavit in support of fees, specifically including all invoice entries, fees, costs, and expenses; include paragraphs related to Wings Financial case.	1.40	300.00	420.00
6/13/24	Draft 7.1f certification and proposed order for attorney fees.	0.20	300.00	60.00
	Subtotal	49.30	--	\$14,790.00

- e. The attorney fees and time spent by Tobi Ladipo, as a law clerk, related to defending this matter amount to a total of \$741.00. That time is detailed as follows:

Date	Description	Hours	Rate	Amount
2/27/24	Review client file (correspondence and pleadings).	1.40	95.00	133.00
2/28/24	Meet and debrief with Atty Kouba on memos to draft; review client file	1.10	95.00	104.50
3/1/24	Draft memorandum of law in opposition of Plaintiff's motion for default judgment; research case law to include to support arguments	3.00	95.00	285.00

3/6/24	Draft memorandum of law in opposition of Plaintiff's motion for default judgment.	2.30	95.00	218.50
	Subtotal	7.8	--	\$741.00

- f. The attorney fees and time spent by Sydney Maglio, as a law clerk, related to defending this matter amount to a total of \$8.50. That time is detailed as follows:

Date	Description	Hours	Rate	Amount
12/14/23	Review demand letter to opposing party.	0.10	85.00	8.50
	Subtotal	0.10	--	\$8.50

- g. The attorney fees and time spent by Toni Hoffer, as a law clerk, related to defending this matter amount to a total of \$85.50. That time is detailed as follows:

Date	Description	Hours	Rate	Amount
1/22/24	Review complaint and track any proposed amendments; forward to Attorney Christensen for final review.	0.40	95.00	38.00
1/23/24	Review email correspondence between Attorney Christensen and client.	0.10	95.00	9.50
1/24/24	Review attorney-client correspondence and all attachments. Review final draft of complaint.	0.30	95.00	28.50
1/25/24	Review correspondence between client and Attorney Christensen regarding potential involvement of Compass.	0.10	95.00	9.50
	Subtotal	0.90	--	\$85.50

- h. The attorney fees and time spent by my paralegal related to defending this matter amount to a total of \$627.00. That time is

detailed as follows:

Date	Description	Hours	Rate	Amount
12/15/23	Prepare and send Demand correspondence to Knapps via Certified U.S. Mail and regular 1st Class U.S. Mail; scan and save to client file.	0.20	125.00	25.00
1/17/24	Draft and save to client file Notice of Appearance; draft and send message to Attorney Christensen providing draft Notice of Appearance for review.	0.30	140.00	42.00
1/18/24	Finalize and electronically file with Court and serve on counsel Notice of Appearance for Hollerman; receipt, download and save to client file Court accepted Notice.	0.20	140.00	28.00
2/21/24	Combined times: Receipt, download and save to client file court docket Documents 10-21, Plaintiffs' Motion to Compel and Motion for Default Judgment; Defendants' Joint Motion to Dismiss and Notices of Appearance for Defendant Compass and associated supporting documents for same; receipt, download and save to client file Court's Briefing Schedule regarding motions.	0.50	140.00	70.00
2/22/24	Receipt, download and save to client file Documents 22-33, Plaintiffs' duplicative motions filings.	0.30	140.00	42.00
2/23/24	Finalize, print and send Hollerman Rule 11 correspondence and [proposed] Motion to Knapps	0.20	140.00	28.00

	via Certified U.S. Mail; scan and save to client file.			
3/5/24	Receipt, download and save to client file Knapps' Notice to Court regarding Pro Se Litigants (Doc 34).	0.10	140.00	14.00
3/11/24	Receipt, download and save to client file Knapps' Responsive Memo in Opposition to Motion to Dismiss.	0.10	140.00	14.00
3/12/24	Receipt, download and save to client file Defendants' Joint Memo and Declarations in Opposition to Plaintiffs' Motion to Compel and Compass' Memo and Declaration in Opposition to Motion for Default. Electronically file with Court and serve on parties Hollerman Memo, Word Count Certificate and Proposed Order in Opposition to Plaintiffs' Motion for Default; draft and save to client file Certificate of Service	0.20	140.00	28.00
3/12/24	by Mail on M. Knapp; print copies of all and serve on M. Knapp; draft and send email correspondence to Judge Nelson providing Word version copy of Hollerman Proposed Order; receipt, download and save to client file Court accepted documents. Receipt, download and save to client file Defendants' Joint	0.40	140.00	56.00
3/20/24	Motion for Sanctions and supporting documents for same (Docs 44-50=13).	0.30	140.00	42.00
3/25/24	Receipt, download and save to client file Knapp Response Memorandum in Opposition	0.20	140.00	28.00

3/26/24	to Motion for Sanctions and Reply Memorandum in Support of Motion for Default. Receipt, download and save to client file Compass Reply Memorandum in Support of Motion to Dismiss.	0.10	140.00	14.00
5/28/24	Print all Rule 11 Sanctions motion documents, collate, index and organize into 3-ring binder, draft and print binder cover, binder index and binder spine in preparation for Motion hearing.	1.30	140.00	182.00
5/29/24	Receipt and save to client file Court issued (text) Order with Briefing Schedule.	0.10	140.00	14.00
	Subtotal	4.50	--	\$627.00

- i. The amount of costs and expenses incurred related to defending this matter amount to a total of \$94.33. Those costs and expenses are detailed as follows:

Date	Description	Amount
12/15/23	USPS fees for sending Demand correspondence to Knapps via Certified U.S. Mail.	11.65
12/15/23	USPS fee for sending Demand correspondence to Knapps via regular 1st class U.S. Mail.	3.75
2/23/24	USPS cost for sending Rule 11 Correspondence and Notice of Motion to Knapps via certified U.S. Mail.	8.93
3/14/24	Twin City Process Service fee for delivery of courtesy copies to Judge Nelson at St. Paul Federal Courthouse.	50.00
5/29/24	Parking for hearing.	8.00
6/6/24	Court reporter Carla R. Bebault fee for production and providing copy of 5/29/24 hearing transcript.	20.00
	Subtotal	\$102.33

35. The subtotals of each category are below:

Category	Amount
Carl Christensen's attorney fees	\$10,135.00
Aaron Sampsel's attorney fees	\$840.00
Christopher Wilcox's attorney fees	\$487.50
Robert Kouba's attorney fees	\$14,790.00
Tobi Ladip's law clerk fees	\$741.00
Sydney Maglio's law clerk fees	\$8.50
Toni Hoffer's law clerk fees	\$85.50
Administrative Assistant fees	\$627.00
Costs and Expenses	\$102.33
TOTAL	\$27,816.83

36. I have reviewed our billing records and the above-described itemization and determined they accurately reflect the time and work performed in this matter, and that the work was necessary to defend against Plaintiffs' Complaint and motions. Charges for unnecessary and duplicative work have been eliminated.

37. Based on the above, Hollerman's total attorney fees, costs, and expenses incurred to defend this matter are \$27,816.83, which contemplates certain reductions described above, including line items passed through at a \$0.00 rate, as well as Hollerman's total costs to defend this matter.

38. It has come to my attention that the transcript of the May 29, 2024,

hearing may have been transmitted to the public within the 90-day prohibition period required by Local Rule 80.1.

39. On Friday, May 31, 2024, the transcript for the May 29, 2024, hearing was sent by the Court Reporter, Ms. Carla Bebault [ECF No. 58].

40. The parties were afforded 21 days to submit a statement of redaction, and transmission of the transcript to the public was restricted for 90 days, pursuant to Local Rule 80.1.

41. On or about May 31, 2024, Brandon Joe Williams posted on his social media the following: “Message to anyone from the Compass/Dan Hollerman case: I’m reading the transcript now...” among other things.

42. Then, on June 5, 2024, in response to a different post by Brandon Joe Williams regarding this case, a different user commented “I read the transcript...” among other things.

43. Both of these posts occurred within the 90-day restriction window regarding the transcript.

I declare under penalty of perjury that the foregoing is true and correct. 28 U.S.C. § 1746

CHRISTENSEN SAMPSEL PLLC

Dated: June 14, 2024

/s/ Carl E. Christensen
Carl E. Christensen (MN #350412)